

RAVEN & KOLBE, LLP  
Keith A. Raven, Esq. (KR-8086)  
Attorneys for Defendants  
HOGAN LEWIS CARTER AND  
WESTERN EXPRESS, INC.  
126 East 56<sup>th</sup> Street, Suite 202  
New York, New York 10022  
(212) 759-7466

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
NAHTAHNIEL SAHGEEV REEL,	:	Civil No.: 22-cv-
	:	
Plaintiff(s),	:	<b><u>NOTICE OF REMOVAL</u></b>
	:	
-against-	:	
	:	
HOPE A. PARKER, HOGAN LEWIS	:	
CARTER, and WESTERN EXPRESS INC.,	:	
	:	
Defendant(s).	:	
-----	X	

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PLEASE TAKE NOTICE defendants, HOGAN LEWIS CARTER and WESTERN EXPRESS, INC., by and through their undersigned counsel, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, respectfully submit this Notice of Removal of this action from the Supreme Court of New York, County of Bronx, in which this action is pending, to the United States District Court for the Southern District of New York, being the district embracing the place where the action is pending. In support of this Notice of Removal, defendants state as follows:

1. On or about February 28, 2022, plaintiff filed a lawsuit in the Supreme Court of the State of New York, County of Bronx, under Index No.: 803110/2022E. A true and complete copy of plaintiff's Summons and Verified Complaint is attached hereto and made a part hereof as

**Exhibit “A”.**

2. Plaintiff’s Summons and Verified Complaint was served on defendant, WESTERN EXPRESS, INC., via Secretary of State of New York on or about March 14, 2022.

3. Plaintiff, NAHTAHNIEL SAHGEEV REEL, is a resident and domiciliary of the County of Bronx, in the State of New York.

4. Defendant HOPE A. PARKER’s address, as listed in the Police Accident Report, is Gonzales, State of Louisiana. A redacted copy of the Police Accident Report is annexed hereto as **Exhibit “B”**.

5. Defendant, HOGAN LEWIS CARTER, is a resident and domiciliary of the State of Georgia.

6. Defendant, WESTERN EXPRESS INC., is a Tennessee corporation.

7. A copy of this Notice of Removal will be filed with the Clerk of the Supreme Court of the State of New York, County of Bronx, and served on all parties as required by 28 U.S.C. §1446(d).

8. This Court has original jurisdiction over this action because there is complete diversity between the parties under 28 U.S.C. §1332(a), and this action is removable to this Court pursuant to 28 U.S.C. §1441(a)-(b).

9. There is complete diversity of citizenship between the plaintiff and the defendants in this action because the plaintiff is a resident of the County of Bronx, in the State of New York; and, defendants are citizens of the State of Louisiana; State of Georgia and State of Tennessee, see Exhibit A and Exhibit B respectively.

10. Furthermore, the amount in controversy exceeds \$75,000, exclusive of interests, costs and attorneys fee, which is based upon a conversation between plaintiff’s counsel and Mr. Brent McKinney, of CBCS, wherein plaintiff’s counsel stated that this was a six figure case.

11. This Notice of Removal is timely filed in that the Notice of Removal was filed within thirty (30) days of defendants first receiving a copy of plaintiff's Summons and Complaint.

12. No prior application for the same or similar relief has been made to this or any other Court.

**WHEREFORE**, defendants, HOGAN LEWIS CARTER and WESTERN EXPRESS, INC., respectfully request that this action be removed from the Supreme Court of the State of New York, County of Bronx, to this Honorable Court, and that this Court assume jurisdiction of this action and issue such further orders and processes as may be necessary to bring before it all parties necessary for the trial.

Dated: April 8, 2022  
New York, New York

RAVEN & KOLBE, LLP  
Attorneys for Defendants  
HOGAN LEWIS CARTER and WESTERN  
EXPRESS, INC.

By: /s/ Keith A. Raven  
KEITH A. RAVEN (KR-8086)

TO:

Krupnik Law Group, P.C.  
Attorneys for Plaintiff  
NAHTAHNIEL SAHGEEV REEL  
108-18 Queens Boulevard, Suite 704  
Forest Hills, New York 11375  
Tel. (718) 532-4400  
Alla Krupnik, Esq.  
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HOPE A. PARKER  
39052 Prairie North Dr.  
Gonzales, LA 70737  
*No Appearance*

**AFFIDAVIT OF SERVICE BY ECF AND MAIL**

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NEW YORK    )

Nelida M. Lamboy-Perez, being duly sworn, deposes and says:

That she is an employee in the office of RAVEN & KOLBE, LLP, attorneys herein; that deponent is not a party to the action or proceeding, is over eighteen (18) years of age, and resides in New York; and, that on April 13, 2022, she filed via ECF and served the within copy of the **NOTICE OF REMOVAL AND EXHIBIT** upon:


Krupnik Law Group, P.C.  
108-18 Queens Boulevard, Suite 704  
Forest Hills, New York 11375  
Alla Krupnik, Esq.  
[calendar@klgteam.com](mailto:calendar@klgteam.com)

HOPE A. PARKER  
39052 Prairie North Dr.  
Gonzales, LA 70737  
*No Appearance*

by depositing a true copy of the same securely in a postpaid wrapper, in a Post Office Box regularly maintained by the United States Government directed to the above-mentioned parties at their respective address above, that this being the address within the State designated by them for the purpose upon the preceding papers in this action or the place where they then kept an office, between which place, there then was and now is a regular communication by mail.

  
\_\_\_\_\_  
NELIDA M. LAMBOY-PEREZ

Sworn to before me this  
13th day of April, 2022

  
\_\_\_\_\_  
Keith A. Raven  
Notary Public, State of New York  
Reg. No. 02RA6011105  
Commission Expires 08-03-23